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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

KENNETH CURRY, RICARDO MAZZITELLI,
JACQUELINE BROWN PILGRIM, on behalf of themselves
and other similarly situated,

Plaintiffs,

- against -

P&G AUDITORS AND CONSULTANTS, LLC; GRC
SOLUTIONS, LLC; PGX, LLC; AND APPLE BANCORP,
INC. d/b/a APPLE BANK FOR SAVINGS,

Defendants

And

PGX, LLC,

Crossclaim Plaintiff,

Against

KDC CONSULTING, LLC, KENNETH CURRY (IN HIS
CAPACITY AS MANAGING MEMBER OF KDC
CONSULTING, LLC), BROPIL CONSULTING, LLC,
JACQUELINE BROWN-PILGRIM (IN HER CAPACITY AS
MANAGING MEMBER OF BROPIL CONSULTING, LLC),
and DENNIS PILGRIM (IN HIS CAPACITY AS
MANAGING MEMBER OF BROPIL CONSULTING, LLC),

Crossclaim Defendants.

NOTICE OF
MOTION
Index No 20-cv-6985

PLEASE TAKE NOTICE, that upon the Memorandum of Law in Support of their Motion
to Dismiss the Complaint, dated March 2, 2021; and the Declaration of Julia H. Klein, Esq., dated

March 2, 2021, and all exhibits attached thereto, and upon all the papers and proceedings had herein, Crossclaim Defendants KDC Consulting, LLC, Kenneth Curry (in his capacity as managing member of KDC Consulting, LLC), Bropil Consulting, LLC, Jacqueline Brown-Pilgrim (in her capacity as managing member of Bropil Consulting, LLC) and Dennis Pilgrim (in his capacity as managing member of Bropil Consulting, LLC) (collectively, “Crossclaim Defendants”) will move this Court, before the Honorable Laura Taylor Swain, at the United States Courthouse for the Southern District of New York located at 500 Pearl Street, New York, New York, 10007 on a date and at a time to be designated by the Court, for an Order:

1. Dismissing Crossclaim Plaintiff PGX, LLC’s Crossclaims with Prejudice; and,
2. Granting such further relief as the Court deems just and proper.

In accordance with Rule 2.b.ii. of the Court’s Individual Rules of Practice, I certify that I have used my best efforts to try and informally the matters raised in this Motion. I have communicated with counsel for Crossclaim Plaintiff PGX by email and in a telephonic meet and confer. As part of these efforts to informally resolve the matters raised in this Motion, Crossclaim Plaintiff PGX has already amended its Crossclaims but the parties have not been able to resolve the remaining issues.

Dated: March 2, 2021

Respectfully submitted,

By: /s/ Julia Klein

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